AFZK-JA (600-29)

24 Nov 99

SUBJECT: Fund-Raising for Unit Events

- 1. Purpose. To discuss methods to raise money for unit events.
- 2. Facts. Army Regulation (AR) 600-29, Fund-Raising Within the Department of the Army, provides that the only official fund-raising that is authorized in the Army is in support of the Combined Federal Campaign and Army Emergency Relief. Just as a unit cannot conduct fund-raisers to support operations, it cannot conduct official fund-raisers to support command-sponsored events such as unit picnics and organization days. These events may be supported through a combination of the unit fund, unofficial fund-raising by private organizations and contributions from individuals participating in the activity.
- 3. The primary source for supporting unit events is the unit fund, which is administered under para 5-12e, AR 215-1, Nonappropriated Fund Instrumentalities and Morale, Welfare, and Recreation Activities, "for the collective benefit of <u>all</u> unit members for off-duty recreational purposes." (Emphasis added.)
- 4. The unit fund may be supplemented by contributions from private organizations (POs), such as an annual picnic fund or a Family Support Group (FSG) fund. Under AR 210-1, Private Organizations on Department of the Army Installations and Official Participation in Private Organizations, para 2-2, an unofficial "informal fund" is exempt from many of the procedural requirements imposed on larger POs. The following rules apply:
- a. An informal fund may not exceed a net worth of \$1,000. If the informal fund exceeds this limit, it must obtain approval to operate as a formal private organization. As a practical matter, the fund may avoid exceeding the ceiling by spending the revenue on necessary expenses for the event.
- b. Only one individual is to be responsible for fund custody, accounting and documentation. This individual will report annually to his or her military rater or civilian supervisor concerning the fund's existence and purpose, financial status, or upon occurrence or suspicion of irregularities associated with the fund. The fund custodian will administer fund business during off-duty time.
- c. Use is limited to expenses consistent with the purpose and function of the fund, and is not to be expended in any way

that is, or appears to be, improper or contrary to Army interests. Contributors must be advised of the funds' purpose.

- d. Participation in PO activities and expending informal funds must comply with the Joint Ethics Regulation (JER).
- 5. Under AR 210-1, para 4-2, fund-raising activities must be limited to occasional activities, such as bake sales and car washes. Like all POs, FSGs and informal funds must obtain the Garrison Commander's approval prior to conducting fund-raising activities. The point of contact is Mr. Doug Vinson, Directorate of Community Activities, (404)464-2605. Fund-raisers must comply with the following guidance:
- a. Because POs are unofficial, requests for the Garrison Commander's approval may not be on letterhead and must be prepared during off-duty time (this may include break times).
- b. Participation in PO activities, such as fund-raisers must be purely voluntary. For this reason FSGs are particularly well suited for conducting fund-raisers as the groups have an established network to identify potential volunteers. No individual may be required to work at such an event or penalized in any way for not supporting it. No record of an individual's participation or list of non-contributors may be maintained. Care should be taken to ensure that those conducting an event do not use their rank or position to solicit contributions from subordinates. Nor may individuals be granted benefits, such as a pass, contingent on working at fund-raisers if those who do not work at the event are not also granted a pass. If a supervisor wishes to grant passes to individuals who work at a fund-raiser, the passes must be provided to personnel who choose not to support the event as well.
- c. Neither soldiers nor civilians may participate in fund-raisers during official time. They must be off-duty. Soldiers who wish to work at an fund-raiser must not do so during duty time or in uniform. However, soldiers who wish to volunteer to work may do so out of uniform. If they work during a period that is equal to their lunch break then they can use that time as their lunch break and not take lunch that day. Alternatively, they may be granted time off to work at the fund-raiser if they first make the time up before the event.
- 6. Finally, although no one may be charged to attend an official event such as a unit picnic, those who choose to eat may be charged for food, as is commonly done for dinings-in. Those who do not wish to pay may be allowed to attend without eating or to bring their own picnic lunch.

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7. Questions should be directed to the undersigned.

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